

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2019-2-E

IN RE:)	SOUTH CAROLINA ELECTRIC & GAS
)	COMPANY'S FIRST REQUEST FOR
Annual Review of Base Rates for Fuel)	PRODUCTION TO THE SOUTH
Costs for South Carolina Electric & Gas)	CAROLINA COASTAL
Company)	CONSERVATION LEAGUE AND THE
_____)	SOUTHERN ALLIANCE FOR CLEAN
		ENERGY

TO: J. BLANDING HOLMAN, IV, ESQUIRE, ATTORNEY FOR THE SOUTH CAROLINA COASTAL CONSERVATION LEAGUE AND THE SOUTHERN ALLIANCE FOR CLEAN ENERGY

Pursuant to S.C. Code Ann. Regs. 103-833 and the South Carolina Rules of Civil Procedure, South Carolina Electric & Gas Company ("SCE&G"), by and through its undersigned counsel, hereby serves upon the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy (collectively, "CCL/SACE") this First Request for Production ("Request") to be answered under oath and in writing within twenty (20) days of the date of service hereof and that the documents identified in such written response be produced for inspection and copying to the undersigned at the offices of Matthew Gissendanner, South Carolina Electric & Gas Company, Mail Code C222, 220 Operation Way Cayce, South Carolina 29033-3701.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information shall be provided to the undersigned in the format as requested.
2. That all responses to the below Request shall be labeled using the same numbers as used herein.

3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to this Request in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That all exhibits be reduced to an 8.5" x 11" format.

6. That all documents be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions and formulas intact.

7. That, in addition to the signature and verification at the close of CCL/SACE's responses, CCL/SACE's witness(es) responsible for the information contained in each response be also indicated.

8. That each request be reproduced at the beginning of the response thereto.

9. That CCL/SACE provide the undersigned with responses to this Request as soon as possible but not later than twenty (20) days from the date of service hereof.

10. If the response to any request is that the information requested is not currently available, state when the information requested will become available.

11. These requests shall be deemed continuing so as to require CCL/SACE to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

12. If a privilege not to answer a request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

13. If a refusal to answer a request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

14. Answer each request on the basis of the entire knowledge of CCL/SACE, including information in the possession of CCL/SACE, its officers, directors, consultants, representatives, agents, experts, and attorneys, if any.

15. If any request cannot be answered in full, answer to the extent possible and specify the reasons for CCL/SACE's inability to answer.

DEFINITIONS

1. The terms "CCL/SACE," "You," and "Your" where used in this Request refers to the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy, both separately and together, together with their employees, agents, consultants, experts, subsidiaries, affiliates, and other operational or functional units and all officers, directors, owners, members, employees, agents and representatives of these entities. It also includes all other persons acting on behalf of the South Carolina Coastal Conservation League and/or the Southern Alliance for Clean Energy.

2. The term "SCE&G" where used in this Request refers to South Carolina Electric & Gas Company.

3. "Document" and "documents" shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, work papers, books, records, letters, photographs, correspondence, communications, electronic mail, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements,

summaries, opinions, studies, analyses, evaluations, contracts, agreements, jotting, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, cd roms, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the South Carolina Rules of Procedure of any kind in your possession, custody or control or to which you have access or know to exist.

4. “Relate,” “relating,” “relating to,” and “related to” when used in this Request shall mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission’s Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

5. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of this Request any information which might otherwise be construed outside their scope.

REQUESTS FOR PRODUCTION

1. Produce all documents referred to by CCL/SACE or its attorneys in preparing the Answers to CCL/SACE's First Set of Interrogatories served contemporaneously herewith.
2. Produce any and all statements, written, oral, or transcribed, of any individual that relate in any manner to the claims of CCL/SACE in this matter or that relate in any manner to the matters at issue in this matter, whether said statements have been taken by CCL/SACE, or any individuals acting on behalf of CCL/SACE.
3. Produce any and all diagrams, sketches, drawings, maps, prints, negatives, photographs, videos, layouts, and other documents that relate in any manner to the claims of CCL/SACE in this matter or that relate in any manner to the matters at issue in this matter.
4. Produce all reports or other documents, including work papers, prepared by any expert witness retained by or on behalf of CCL/SACE in this case, including a current curriculum vitae.
5. Produce all documents in the custody or control of CCL/SACE or its attorneys that relate in any manner to the claims of CCL/SACE in this matter or that relate in any manner to the matters at issue in this matter, including without limitation, all exhibits CCL/SACE intends to use at trial.
6. Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact that support or form the basis for the testimony that you intend to present of any person identified in response to Interrogatory Nos. 1, 3, 4, or 5 as set forth in the First Set of Interrogatories served contemporaneously herewith.

7. Produce any and all documents, including work papers, setting forth or containing any calculations, studies, or other similar analyses that relate in any manner to the claims of CCL/SACE in this matter or that relate in any manner to the matters at issue in this matter.

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Columbia, South Carolina
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